

EPA Appendix F - Risk Assessment # 30

Comment:

Section 8.3.5: The last paragraph on this page discusses risks to the remediation worker from inhalation. The SFS should clarify why EPA guidance for inhalation of fugitive dust (EPA, 2000), including the use of the default PEF value, was not used here.

Discussion:

The cited text was offered to demonstrate that risks from airborne exposures to all receptors (including off-site receptors) were acceptable because inhalation risks to the RME receptor were acceptable. This screening approach has been removed from Appendix F and replaced with an alternate approach as requested by EPA reviewers.

Risks to a hypothetical receptor at the site boundary have been reevaluated by estimating air concentrations at the boundary and evaluating the risks to the target receptor from those concentrations. An enhanced discussion of soil-to-air suspension factors found in the literature has been added to Appendix F, along with the reason for selecting the value used in to calculate boundary air concentrations has been added to Appendix F. As part of that discussion, EPA's Particle Emission Factor (PEF) has been introduced as a means to estimate the amount of suspended material that is available for respiration.

Proposed Text Change:

The revised approach used to calculate risks to a boundary receptor from emissions associated with construction activities has been added to the short-term risk evaluation for each alternative. Short-term risks in Sections 9-12 of Appendix F are currently being revised as updated information on schedules, material handling processes and transportation requirements become available.

EPA FEEDBACK:

EPA generally accepts the proposed change; however we will need to review the specific changes in the final SFS report to determine if they fully address this issue.